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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STIPULATION

Plaintiff the United States of America, by and through Special Assistant United States Attorney Philip Kopczynski, Defendant Claudio Maciel, by and through his attorney John Forsyth, and Defendant Enzo Cestoni, by and through Assistant Federal Public Defender Ellen Leonida, hereby stipulate that, with the Court's approval, the time between January 12, 2016 and April 4, 2016 is excludable under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation by counsel, as stated

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STIP. TO EXCLUDE TIME; ~~PROPOSED~~ ORDER
NO. 15-CR-416 WHA

1 on the record on January 12, 2016.

2 IT IS SO STIPULATED.

3 Dated: January 13, 2016

_____/s/_____
4 PHILIP KOPCZYNSKI
Special Assistant United States Attorney

5 Dated: January 13, 2016

6 ____/s/_____
7 ELLEN LEONIDA
Assistant Federal Public Defender
8 Attorney for Enzo Cestoni

9 Dated: January 13, 2016

10 ____/s/_____
11 JOHN D. FORSYTH
12 Attorney for Claudio Maciel

1 **[PROPOSED] ORDER**

2 GOOD CAUSE APPEARING, upon stipulation of the parties,

3 THE COURT FINDS that failing to exclude the time between January 12, 2016 and April 4,
4 2016 would unreasonably deny counsel the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

6 THE COURT FURTHER FINDS that the ends of justice served by excluding the time between
7 January 12, 2016 and April 4, 2016 from computation under the Speedy Trial Act outweigh the interests
8 of the public and the defendants in a speedy trial.

9 THEREFORE, IT IS HEREBY ORDERED that the time between January 12, 2016 and April 4,
10 2016 shall be excluded from computation under the Speedy Trial Act.

11 IT IS SO ORDERED.

12 Dated: January 19, 2016


HON. WILLIAM ALSUP
United States District Judge